
**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF IOWA**

In Re: MERCY HOSPITAL, IOWA CITY, IOWA, et al.

**CHAPTER 11
Case No. 23-00623**

RESPONSE TO OBJECTION TO ADMINISTRATIVE CLAIM

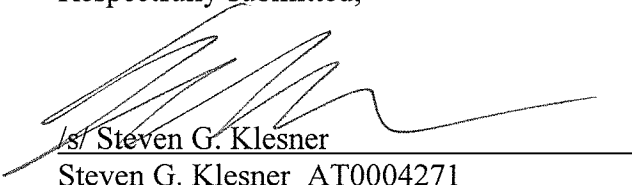
Comes now creditor, Travel Nurse Across America, LLC (“TNAA”), by and through counsel, and for its Response to the Objection to Administrative Claim (the “Objection”) filed by Dan R. Childers, in his sole capacity as Trustee of the Mercy Hospital Liquidation Trust (“Trustee”), states as follows:

1. On March 14, 2024, TNAA filed Administrative Claim # 40055 in the amount of \$25,776.25 (the “Claim”) for services performed.
2. The Trustee filed its Objection on November 6, 2024 alleging that the Claim is not supported by the requisite documentation. The Objection requires that TNAA file any objection to the Trustee’s Objection to Claim on or before December 6, 2024.
3. Accordingly, TNAA hereby objects to the Trustee’s Objection to Claim and request that it be allowed to present the requisite supporting documentation, attached hereto as EXHIBIT A.
4. TNAA will also be filing an amended claim.

WHEREFORE, TNAA respectfully requests that the Trustee’s Objection to Claim be denied, and for all other just and proper relief to which it is entitled.

Respectfully submitted,

Dated: December 6, 2024


/s/ Steven G. Klesner

Steven G. Klesner AT0004271
JOHNSTON, STANNARD, KLESNER,
BURBIDGE & FITZGERALD, P.L.C.
373 Scott Ct, Ste B, PO Box 3400
Iowa City, IA 52244
steve@iclawfirm.com
(319)338-9852 Telephone
(319) 354-7265 Facsimile
ATTORNEY FOR CREDITOR
TRAVEL NURSE ACROSS AMERICA, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the date below, a true copy of the foregoing document was electronically filed in the ECF system. Notice of this filing will be sent to the parties of record by operation of the Court's electronic filing systems. Parties may access this filing through the Court's electronic system.

Dated: December 6, 2024

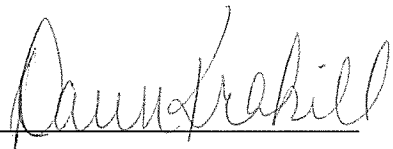

/s/ Dawn Krabill

EXHIBIT A

Invoice No	Invoice Date	Asmt No	nurses::nursename	Hosp No	Hosp_inv::Hospital	Short	creation date	GrandTotal	client_ref	acct_payroll::Wk Ending
22-817306	8/21/2023	Brid62120-9	Jennifer Bridges	HS4761	Mercy Hosp		8/21/2023	3,466.25	599058	8/12/2023
22-881504	1/26/2024	Musi229387-9	Jacqueline Musick	HS4761	Mercy Hosp		1/26/2024	4,015.00	631935	1/20/2024
22-881518	1/26/2024	Sand416473-1	Maribel Sanders	HS4761	Mercy Hosp		1/26/2024	3,400.00	631930	1/13/2024
22-881563	1/26/2024	Brid62120-11	Jennifer Bridges	HS4761	Mercy Hosp		1/26/2024	3,075.00	631933	1/20/2024
22-884705	2/5/2024	Brid62120-11	Jennifer Bridges	HS4761	Mercy Hosp		2/5/2024	3,735.00	633427	1/27/2024
22-887539	2/14/2024	Musi229387-9	Jacqueline Musick	HS4761	Mercy Hosp		2/14/2024	4,042.50	633426	1/27/2024
22-887540	2/14/2024	Musi229387-9	Jacqueline Musick	HS4761	Mercy Hosp		2/14/2024	4,042.50	634203	2/3/2024



Travel Nurse Across America

Case 21-16622 Doc 1519

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Date: 8/21/2023

Terms: 70 days

Invoice: **22-817306**

Billing Period: 8/6/2023 - 8/12/2023

Mercy Hospital
Attn: Medefis Billing
Medefis
2121 N. 117th Avenue, Suite 200
Omaha, NE 68164

Invoice for Temporary Staffing - **Jennifer Bridges** / RN PACU

Date	Unit	In - Out	Break	In - Out	Code	Hours	Price	Line Total
8/7/23	PACU	10:30 - 18:16	.5		Regular	7.25	\$105.00	\$761.25
8/8/23	PACU	10:30 - 19:15	.5		Regular	8.25	\$105.00	\$866.25
8/9/23	PACU	10:30 - 19:50	.5		Regular	8.75	\$105.00	\$918.75
8/10/23	PACU	10:30 - 19:00	.5		Regular	8.00	\$105.00	\$840.00
8/11/23	PACU		0		Cancel hrs	7.75		
8/11/23	PACU		0		Call	9.00	\$5.00	\$45.00
8/12/23	PACU		0		Call	7.00	\$5.00	\$35.00
Subtotal								\$3466.25
Gross Receipts/Excise Tax								
Hrs Total						56.00	Total	\$3466.25

Thank you

If you have any questions regarding this invoice,
please contact Accounts Receivable at
800-240-2526 or Email: **AR@tnaa.com**

Tax ID: 20-1068277

Travel Nurse Across America, LLC
5020 Northshore Dr., Suite 2
North Little Rock, AR 72118
TEL: 800-240-2526
FAX: 501-663-2886

Send payment to:

Travel Nurse Across America, LLC
Dept 730068
PO Box 660919
Dallas, TX 75266-0919

Overnight Deliveries should be addressed to:

Travel Nurse Across America, LLC
Fifth Third Wholesale Lockbox
Dept 730068
2701 E. Grauwylar Rd.
Irving, TX 75061

Medefis HS4761 No Mail, Medefis



Travel Nurse Across America

Doc 1519

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Date: 1/26/2024

Terms: 70 days

Invoice: **22-881518**

Billing Period: 1/7/2024 - 1/13/2024

Mercy Hospital
Attn: Medefis Billing
Medefis
2121 N. 117th Avenue, Suite 200
Omaha, NE 68164

Invoice for Temporary Staffing - **Maribel Sanders** / RN Endo

Date	Unit	In - Out	Break	In - Out	Code	Hours	Price	Line Total
1/8/24	Endo	7:15 - 16:30	.5		Regular	8.75	\$100.00	\$875.00
1/9/24	Endo	6:15 - 16:30	.5		Regular	9.75	\$100.00	\$975.00
1/10/24	Endo	11:11 - 16:22	0		Regular	5.00	\$100.00	\$500.00
1/11/24	Endo	5:56 - 16:53	.5		Regular	10.50	\$100.00	\$1050.00
Subtotal								\$3400.00
Gross Receipts/Excise Tax								
Hrs Total						34.00	Total	\$3400.00

Thank you

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Across America**

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Date: 1/26/2024

Terms: 70 days

Invoice: **22-881563**

Billing Period: 1/14/2024 - 1/20/2024

Mercy Hospital
Attn: Medefis Billing
Medefis
2121 N. 117th Avenue, Suite 200
Omaha, NE 68164

Invoice for Temporary Staffing - **Jennifer Bridges** / RN PACU

Date	Unit	In - Out	Break	In - Out	Code	Hours	Price	Line Total
1/16/24	PACU	10:30 - 12:00	0	12:30 - 17:30	Regular	6.50	\$100.00	\$650.00
1/17/24	PACU	10:30 - 13:00	0	13:30 - 19:00	Regular	8.00	\$100.00	\$800.00
1/18/24	PACU	10:30 - 13:00	0	13:30 - 18:30	Regular	7.50	\$100.00	\$750.00
1/19/24	PACU	10:30 - 13:15	0	13:45 - 19:00	Regular	8.00	\$100.00	\$800.00
1/19/24	PACU	19:01 - 19:50	0		Call Back	0.75	\$100.00	\$75.00
Subtotal								\$3075.00
Gross Receipts/Excise Tax								
Hrs Total						30.75	Total	\$3075.00

Thank you
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Dallas, TX 75266-0919

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2701 E. Grauwlyer Rd.
Irving, TX 75061

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Date: 1/26/2024

Terms: 70 days

Invoice: **22-881504**

Billing Period: 1/14/2024 - 1/20/2024

Mercy Hospital
Attn: Camie Marshek
HR

Invoice for Temporary Staffing - **Jacqueline Musick** / RN LD

Date	Unit	In - Out	Break	In - Out	Code	Hours	Price	Line Total
1/16/24	LD	18:52 - 7:28	.5		Regular	12.25	\$110.00	\$1347.50
1/17/24	LD	18:52 - 7:26	.5		Regular	12.25	\$110.00	\$1347.50
1/18/24	LD	18:53 - 7:34	.5		Regular	12.00	\$110.00	\$1320.00
Subtotal								\$4015.00
Gross Receipts/Excise Tax								
Hrs Total						36.50	Total	\$4015.00

Thank you

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Date: 2/5/2024

Terms: 70 days

Invoice: **22-884705**

Billing Period: 1/21/2024 - 1/27/2024

Mercy Hospital
Attn: Medefis Billing
Medefis
2121 N. 117th Avenue, Suite 200
Omaha, NE 68164

Invoice for Temporary Staffing - **Jennifer Bridges** / RN PACU

Date	Unit	In - Out	Break	In - Out	Code	Hours	Price	Line Total
1/22/24	PACU	10:30 - 14:10	0	14:40 - 19:11	Regular	8.25	\$100.00	\$825.00
1/23/24	PACU	10:30 - 13:00	0	13:30 - 19:13	Regular	8.25	\$100.00	\$825.00
1/24/24	PACU	10:30 - 15:00	0	15:30 - 18:12	Regular	7.25	\$100.00	\$725.00
1/26/24	PACU	10:30 - 13:00	0	13:30 - 18:30	Regular	7.50	\$100.00	\$750.00
1/26/24	PACU	18:30 - 20:30	0		Call	2.00	\$5.00	\$10.00
1/26/24	PACU	20:31 - 1:00	0		Call Back	4.50	\$100.00	\$450.00
1/27/24	PACU	1:01 - 23:59	0	0:00 - 7:00	Call	30.00	\$5.00	\$150.00
Subtotal								\$3735.00
Gross Receipts/Excise Tax								
Hrs Total						67.75	Total	\$3735.00

Thank you

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2701 E. Grauwylar Rd.
Irving, TX 75061

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Date: 2/14/2024

Terms: 70 days

Invoice: **22-887539**

Billing Period: 1/21/2024 - 1/27/2024

Mercy Hospital
Attn: Camie Marshek
HR

Invoice for Temporary Staffing - **Jacqueline Musick** / RN LD

Date	Unit	In - Out	Break	In - Out	Code	Hours	Price	Line Total
1/22/24	LD	18:52 - 7:38	.5		Regular	12.50	\$110.00	\$1375.00
1/23/24	LD	18:54 - 7:32	.5		Regular	12.00	\$110.00	\$1320.00
1/24/24	LD	18:54 - 7:40	.5		Regular	12.25	\$110.00	\$1347.50
Subtotal								\$4042.50
Gross Receipts/Excise Tax								
Hrs Total						36.75	Total	\$4042.50

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Irving, TX 75061

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Date: 2/14/2024

Terms: 70 days

Invoice: **22-887540**

Billing Period: 1/28/2024 - 2/3/2024

Mercy Hospital
Attn: Camie Marshek
HR

Invoice for Temporary Staffing - **Jacqueline Musick** / RN LD

Date	Unit	In - Out	Break	In - Out	Code	Hours	Price	Line Total
2/1/24	LD	18:53 - 7:59	.5		Regular	12.50	\$110.00	\$1375.00
2/2/24	LD	18:53 - 7:52	.5		Regular	12.25	\$110.00	\$1347.50
2/3/24	LD	18:54 - 7:31	.5		Regular	12.00	\$110.00	\$1320.00
Subtotal								\$4042.50
Gross Receipts/Excise Tax								
Hrs Total						36.75	Total	\$4042.50

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